

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

U. S. DISTRICT COURT
Southern District of Ga.

Filed in Office

4-15 PM

2-3 2021

Deputy Clerk

UNITED STATES OF AMERICA

v.

NIHAD AL JABERI

) INDICTMENT NO.

) 18 U.S.C. § 554

) Smuggling

) 18 U.S.C. § 922(e)

) Failure to Notify a Common Carrier

) 13 U.S.C. § 305

) Submitting False or Misleading

) Export Information

CR 421-0031

THE GRAND JURY CHARGES THAT:

COUNT ONE

Smuggling

18 U.S.C. § 554

On or about August 4, 2020, in Chatham County, within the Southern District of Georgia, and elsewhere, the defendant,

NIHAD AL JABERI

did willfully and knowingly attempt to export and send the below-listed items from the United States, contrary to Title 18, United States Code, Section 922(e) (Failure to Notify a Common Carrier), and contrary to Title 13, United States Code, Section 305 (Submitting False or Misleading Export Information), which are laws of the United States:

a. a Beretta, model APX, 9mm caliber pistol;

- b. a Magnum Research, model Desert Eagle, .44 caliber pistol;
- c. an F&N, model 509, 9mm caliber pistol;
- d. a Sako, model A7S, .308 caliber rifle, serial # K90825;
- e. a Cooper Firearms, model Colt M2012-CLR, .308 caliber rifle;
- f. a Christensen Arms, model 14, .308 caliber rifle;
- g. a Weatherby, model MDT LSS-XL, .308 caliber rifle;
- h. a Browning, model X Bolt, .308 caliber rifle; and
- i. a Sabatti, model STR, .308 caliber rifle.

All in violation of Title 18, United States Code, Section 554.

COUNT TWO
Failure to Notify a Common Carrier
18 U.S.C. § 922(e)

On or about July 24, 2020, in Chatham County, within the Southern District of Georgia, and elsewhere, the defendant,

NIHAD AL JABERI

did knowingly deliver and cause to be delivered to a common and contract carrier for transportation and shipment in foreign commerce, to persons other than a licensed importer, manufacturer, dealer and collector, a package containing firearms, and did so without giving written notice to the carrier that such firearms were being transported and shipped, in that **AL JABERI** listed the contents of the package as “71 Pieces of Spare Auto Parts with No License Required,” while knowing the package contained firearms.

All in violation of Title 18, United States Code, Section 922(e).

COUNT THREE

Submitting False or Misleading Export Information
13 U.S.C. § 305

On or about July 28, 2020, in Chatham County, within the Southern District of Georgia, and elsewhere, the defendant,

NIHAD AL JABERI

did knowingly cause freight forwarder North Atlantic Logistics, Inc., to submit false and misleading export information through a Shippers Export Declaration and the Automated Export System, by falsely declaring the contents of the shipment to only be "71 Pieces of Spare Auto Parts with No License Required" when, in fact, **AL JABERI** knew the shipment at issue also contained firearms.

All in violation of Title 13, United States Code, Section 305.

FORFEITURE ALLEGATION

The allegations contained in Counts Two and Three of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 13, United States Code, Section 305(a)(3), Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461.


Upon conviction of the Title 13 offense alleged in Count Two of this Indictment, the defendant, **NIHAD AL JABERI** shall forfeit to the United States pursuant to Title 13, United States Code, Section 305(a)(3), any interest in, security of, claim against, or property or contractual rights of any kind in the goods or tangible items that were the subject of the violation, any interest in, security of, claim against, or property or contractual rights of any kind in tangible property that was used in the export or attempt to export that was the subject of the violation, and any property constituting, or derived from, any proceeds obtained directly or indirectly as a result of the violation, including, but not limited to,


- a. Beretta, model APX, 9mm caliber pistol, serial # A030574X;
- b. Magnum Research, model Desert Eagle, .44 caliber pistol serial # DK0050568;
- c. F&N, model 509, 9mm caliber pistol, serial # GKS0037076;
- d. Sako, model A7S, .308 caliber rifle, serial # K90825;
- e. Cooper Firearms, model Colt M2012-CLR, .308 caliber rifle, serial # CLR0523;
- f. Christensen Arms, model 14, .308 caliber rifle, serial # 7M05986;
- g. Weatherby, model MDT LSS-XL, .308 caliber rifle, serial # VB124356;
- h. Browning, model X Bolt, .308 caliber rifle, serial # 19467ZN354; and
- i. Sabatti, model STR, .308 caliber rifle, serial # R71722.


(Collectively, the "Subject Property").

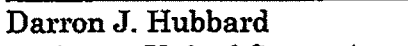
Furthermore, upon conviction of the Title 18 offense alleged in Count Three of this Indictment, the defendant, **NIHAD AL JABERI** shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461, any firearm or ammunition, involved in or used in violation of the charged offense, including, but not limited to the Subject Property.

A True Bill.



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